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June 2, 1999

K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219

Re: *Third Party Testing of BellSouth's Operational Support Systems*
Docket No. 99-00347

Dear David:

Enclosed for filing are the original and thirteen copies of Comments of The Southeastern Competitive Carriers Association ("SECCA") in the above-captioned proceeding.

Thank you for your attention to this matter.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/th

Enclosures

cc: All Parties of Record

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: Third Party Testing of BellSouth's Operational Support Systems
Docket No. 99-00347**

COMMENTS OF THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION

The Southeastern Competitive Carriers Association ("SECCA") hereby submits its comments in support of the Petition for the Establishment of a Third-Party Testing Program of Operational Support Systems filed by AT&T Communications of the Southern States, Inc. ("AT&T").

Operational Support Systems ("OSS") are critical to the development of competition in the local exchange market because OSS enables competitive carriers to order and provision service to customers, as well as to provide billing, maintenance and repairs. In May 1998, competitive carriers demonstrated during Section 271 hearings in Tennessee that BellSouth failed to provide nondiscriminatory access to its OSS. In October 1998, the FCC ruled for the third time that BellSouth's OSS failed in numerous ways to meet the requirements of the Telecommunications Act of 1996. And just two months ago, BellSouth withdrew its Section 271 case in Tennessee as the Authority was preparing to issue its 271 Order, which almost certainly would have addressed OSS issues extensively. Clearly, another approach must be found to prompt BellSouth to comply with its obligation to provide nondiscriminatory access to OSS.


Third party testing offers the way around the OSS impasse. Third party testing would involve thorough testing of all OSS functions and order types. BellSouth's OSS would be stress tested on an end-to-end basis with high order volumes to ensure that the systems can operate in a

commercial environment. One objective of third party testing would be to provide the Authority with an objective assessment of BellSouth's OSS. Perhaps an even more important objective would be to ensure that problems with BellSouth's OSS are fixed. Once problems are identified and remedied, and BellSouth's OSS is re-tested with a passing grade, the Authority will have some assurance that OSS is available to competitive carriers that will support broad-scale local competition. In short, SECCA endorses the third party test plan proposed by AT&T.

The Georgia Public Service Commission recently recognized the importance of third party testing when it issued an order on May 20, 1999 directing BellSouth to undertake third party testing of its OSS. The Georgia Commission's Order represents a key first step toward the implementation of third party testing, but there remains room for improvement. Under the Georgia Order, for example, BellSouth is to develop the third party test plan and choose the firms that will conduct the testing. The better approach, as outlined in the AT&T proposal, would be for the testers to be chosen by an entity other than BellSouth, and for the testers to develop the test plan, with the opportunity for comment by the parties and staff. In addition, under the Georgia Order it appears that certain key areas may not be tested. Yesterday, on June 1, 1999, BellSouth filed in Georgia its proposed test plan totaling more than 500 pages. Some time will be required to review the plan and determine where there are gaps in the proposed testing.

SECCA encourages the Authority to build on the work being commenced by the Georgia Commission. By supplementing the efforts of the Georgia Commission, the Authority can play an important role by ensuring that BellSouth's OSS is developed so it supports local competition on an ongoing basis.

Respectfully submitted,

By: 
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Nashville, Tennessee 37219

Counsel for SECCA

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on the 2nd day of June, 1999.

Jim Lamoureux
AT&T of the South Central States
1200 Peachtree Street, NE
Room 8068
Atlanta, Georgia 30309


Henry Walker